

© Paul-Kenneth: Cromar™
Defendant *in error*, – inmate #567164
Sui Juris [pro se], natural man
c/o Davis County Correctional Facility
800 W. State Street / Farmington, Utah 84025 / 801-451-4100

FILED US District Court-UT
JUN 26 '24 AM09:20

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

	/	
"PAUL KENNETH CROMAR"	/	DEFENDANT'S MOTION TO
Defendant - <i>in error</i>	/	COMPEL PLAINTIFF'S TIMELY
v.	/	RESPONSE & LEGAL SERVICE
	/	
UNITED STATES OF AMERICA	/	case # 2:23-cr-00159-HCN-DBP
(DUNs # 052714196)	/	
Plaintiff - <i>in error</i>	/	Judge Howard C. Nielson Jr.
	/	

1. Comes now, Paul-Kenneth: Cromar,¹ "Ken", defendant *in-error*, *Sui Juris* [pro se], in *propia persona*, does hereby respectfully present on the record of this court this **Defendant's Motion to Compel Timely Response & Legal Service**, for reasons provided for hereafter:

¹ A red-blooded, living, breathing American sovereign, anointed to become a king and priest, son and heir unto the Most High God. See Docket #265 "AFFIDAVIT Notice of Equity Claim", which includes but is not limited to Fourth Judicial Notice, Fifth Judicial Notice, and Seventh Judicial Notice, AND see also footnotes 1-4, 7-8, from Defendants Motion to Dismiss (docket #70) and also as, of yet un rebutted Defendant's AFFIDAVIT (docket #71) for jurisdictional and definition of terms. Note: An un rebutted affidavits stand as fact. Also, Defendant elected to proceed only under Constitutional Common law (see docket #25). See also BIBLE Romans 8: 14-17.

2. Defendant respectfully moves the court to order the plaintiff to make timely legal service of all pleadings on the defendant in jail.
3. Plaintiff has failed to consistently make legal service of important pleadings on the defendant while in jail for over seven months since August 30, 2023 leading up to trial.
4. Therefore, if plaintiff intends to RESPOND or OPPOSE any of Defendants filings (including but not limited to entries #311, #312, #313, #314, #315 and #316, and any other filing hereafter), they need to make timely service of those pleadings on the defendant so that defendant can make timely REPLY to them. (see Motion to Dismiss for Insufficient Service of Process, Docket #222 of May 2, 2024.)
5. Please take Judicial Notice: Docket #316 - **Writ of Quo Warranto** is erroneously listed as "lodged for reference purposes only; no response required unless specifically ordered by the court". However, a *Writ Quo Warranto* ("By what authority?") serves as an *extraordinary* jurisdictional challenge by WRIT and is not discretionary, and therefore **MUST** be answered, as a non-reply serves as admission of certain facts contained therein.

PRAYER FOR RELIEF

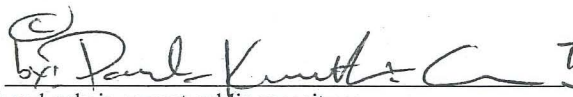
6. Therefore, for good cause showing above, the Defendant – *in error* respectfully moves this court to grant an ORDER to the Plaintiff UNITED STATES OF AMERICA to provide **Timely Response & Legal Service**, for reasons provided above -- in the interest of justice.

Notice to principal, is notice to agent. Notice to agent, is notice to principal.

Respectfully and *In Honor*, presented to this court on the 25th day of the 6th month, in the year of our Lord Jesus Christ, anno domini 2024,

Davis County)
)
 Utah Republic)
 united States of America)

Asseveration

L.S.  TM
 Signed only in correct public capacity as
 Sole Heir & Executor to Paul-Kenneth: Cromar Estate

Paul Cromar - #567164
 c/o Davis County Correctional Facility

800 W. State Street
Farmington, Utah 84025-0618
- or -
PO Box 942
Pleasant Grove, Utah [84062]

NOTE: Permanent address remains: 9870 No. Meadow Drive / Cedar Hills, Utah state, under **LAND PATENT #392 part and parcel** thereof, signed by then President Grover Cleveland on February 26, 1887, by an Act of Congress;

We, Paul-Kenneth: and Barbara-Ann: of the House of Cromar., remain standing on, having never abandoned our Metes and Bounds, which are as follows:

"Beginning at the Northeast corner of Lot 3, Plat "C", Amended North Meadow Estates Subdivision, said point being S89°28'48"W 1129.68 feet along the Quarter Section line, and S0°00'00"W 773.49 feet from the East 1/4 corner of Section 6, Township 5 South, Range 2 East of the Salt Lake Base and Meridian, and running thence along said Lot 3 boundary line the following five (5) course: (1) S0°18'49"W 96.09 feet; (2) S89°59'43"W 149.21 feet; (3) along a curve to the right 23.50 feet through a central angle of 89°46'16" having a radius of 15.00 feet and a chord that bears N45°07'09"W 21.17 feet; (4) N0°14'01"W 80.49 feet; (5) N89°45'59"E 165.06 feet to the point of beginning, containing 0.361 acres."

[for LOT "C", AMENDED NORTH MEADOW ESTATES
SUBDIVISION within the SE ¼ of SEC. 6, T.5 S., R.2 E. SLBM – 0.361 acres]

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of June, 2024, I personally placed in the United States Mail to the individuals named below a true and correct copy of **DEFENDANT'S MOTION TO COMPEL PLAINTIFF'S TIMELY RESPONSE AND LEGAL SERVICE.**

TRINA A. HIGGINS
PATRICK BURNS
MEREDITH M. HAVEKOST
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Salt Lake City, Utah 84111



Raland Brunson